

1 JEFFREY A. SMITH, ESQ.

2 Colorado Bar No. 31038

3 *Motion for Permission to Practice*

4 *Pro Hac Vice and Designation of*

5 *Local Counsel Pursuant to*

6 *LR IA 10-2 Pending*

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24 *Attorneys for Defendant*

25 *INFONOW CORPORATION dba*

26 *CHANNELINSIGHT*

27 **UNITED STATES DISTRICT COURT**  
28 **DISTRICT OF NEVADA**

NAHUM RAND,

Plaintiff,

vs.

MICHAEL PATSALOS-FOX; PAUL  
BARTLETT; MICHAEL PATTERSON; TIM  
CONNOR; RHO VENTURES; VEDANTA  
CAPITAL LP; SEQUEL VENTURE  
PARTNERS; INFONOW CORPORATION dba  
CHANNELINSIGHT; DOES I through X,  
inclusive; and ROE CORPORATIONS I  
through X, inclusive,

Defendants.

Case No.: 2:15-cv-01510-RFB-GWF

**STIPULATION TO EXTEND TIME FOR  
DEFENDANTS MICHAEL PATSALOS-  
FOX, MICHAEL PATTERSON,  
VEDANTA CAPITAL, LP AND PAUL  
BARTLETT TO RESPOND TO  
PLAINTIFF'S FIRST AMENDED  
COMPLAINT [1-1]**

**(First Request)**

1 Defendant INFONOW CORPORATION dba CHANNELINSIGHT (“InfoNow”) and  
2 Plaintiff NAHUM RAND, by and through their counsel of records, hereby stipulate to allow  
3 Defendants Michael Patsalos-Fox, Michael Patterson, Vedanta Capital, LP and Paul Bartlett  
4 (collectively, “Defendants”) an extension of time to file their responses to Plaintiff’s First  
5 Amended Complaint. In furtherance of the Stipulation, Defendants state as follows:

6 1. Defendants’ response to the First Amended Complaint is due on Tuesday, August  
7 25, 2015.

8 2. Due to the press of business of Defendants’ lead counsel and other pre-existing  
9 obligations, Defendants require an additional 15 days, up to and including September 9, 2015 in  
10 which to file their response to the First Amended Complaint.

11 3. Additionally, because Defendants believe there are threshold personal  
12 jurisdictional questions raised by the First Amended Complaint, counsel for the parties are  
13 discussing ways to resolve jurisdictional concerns and avoid burdening the Court with  
14 unnecessary motions. However, the parties need additional time to work through these  
15 discussions.

16 4. Plaintiff’s counsel, Erik W. Fox, has stipulated to the requested extension of time.

17 5. This is the first extension of time sought by Defendants.

18 6. The requested extension will not prejudice the parties, especially since not all  
19 defendants have been served, nor will the requested extension prejudice the Court.

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1 WHEREFORE, for the foregoing reasons, InfoNow and Plaintiff respectfully requests  
2 that the Court accept this Stipulation and extend the time for Defendants to respond to the First  
3 Amended Complaint to September 9, 2015.

4 DATED this 20th day of August, 2015.

5  
6 /s/ Jeffrey A. Smith

7 JEFFREY A. SMITH, ESQ.  
8 Colorado Bar No. 31038  
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21 *CHANNELINSIGHT*

/s/ Adam H. Springel

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16 /s/ Erik W. Fox

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25 *Attorney for Plaintiff*

26 **IT IS SO ORDERED.**

27 Dated: August 24, 2015

28   
GEORGE FOLEY, JR.

United States Magistrate Judge

**CERTIFICATE OF SERVICE**

Pursuant to Local Rule 5 of this Court, I certify that I am an employee of Springel & Fink LLP and that on this 20th day of August, 2015, I caused a correct copy of the foregoing **STIPULATION TO EXTEND TIME FOR DEFENDANTS MICHAEL PATSALOS-FOX, MICHAEL PATTERSON, VEDANTA CAPITAL, LP AND PAUL BARTLETT TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT [1-1] (First Request)** to be served via CM/ECF to:

Erik W. Fox, Esq.  
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*Attorney for Plaintiff*

/s/ Erin L. Wood

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An employee of Springel & Fink LLP